



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

January 3, 2020

By ECF and Hand Delivery

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

1-2-2020

Re: *United States v. Ragonese, 19 Cr. 154 (PAC)*

Dear Judge Crotty:

The requested adjournment is granted to February 21 at 4PM. Time is excluded until 2/21/2020.

So ordered

Paul M. Wern

The Government respectfully submits this letter on behalf of all parties to request the conference scheduled for January 7, 2020, be adjourned for 45 days, until February 21, 2020, or another date and time that is convenient for the Court. On November 25, 2019, the defendant submitted a mitigation request, which remains under consideration by the United States Attorney's Office. An adjournment of 45 days will allow the Office to conclude its consideration of the mitigation request, and for the parties to continue working toward a pre-trial resolution.

The Government requests that time be excluded between January 7, 2020, and February 21, 2020, or the date of the next conference, whichever is later, under the Speedy Trial Act, pursuant to Title 18, United States Code, Section 3161(h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial, because it will allow the Government and defense counsel to continue discussions regarding a possible disposition in the matter.

Respectfully Submitted,

GEOFFREY S. BERMAN
United States Attorney

By: /s/

Daniel H. Wolf
Assistant United States Attorney
(212) 637-2337

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 1-6-2020

cc: Ariel Werner, Esq. (by ECF)
Annalisa Miron, Esq. (by ECF)